

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NUMBER: 20-02911

FERNANDO L. ROSA VILLEGAS
DEBTOR

CHAPTER: 13

INFORMATIVE MOTION

TO THE HONORABLE COURT:

MOTION REQUESTING DISMISSAL

Comes now, Tania M. Solano Andújar, through her undersigned counsel and respectfully states and prays:

1. On or around **August 18, 2020**, the subscriber notified all pertinent parties, involved in this case, about critical errors that have been included within this petition.
2. Today, we repeat ASUME's apparent certification, pertaining to the amount owed by debtor to our client, falls short when compared to the correct amount of debt that is really owed to our client. To make it worse, debtor has failed to make any child support payment, for more than 10 consecutive months, preceding this motion. As far as it was brought to our attention, by our client, at most, debtor made no more than two child support payments during **2020**. Debtor has failed to pay any child support for **2021** either.

Similarly, our client should not be compelled to share, nor publish her exact physical location, nor physical address anywhere she does not feel is safe doing it. The debtor already directly confessed, under oath, and in open court back in a **2018**'s Carolina Superior Court, perpetrating a wide range of felonies, and Law 54's violations, against our client. An urgent and serious exception must be applied, for all victims of crimes, who, as our client does, are actively hiding from the person she fears the most: debtor Rosa Villegas.

Wherefore, our client respectfully requests for this Honorable Court enter an Order asking:

- a. ASUME to correct all or its certified errors, regarding our client's debt;
- b. For our client's address to be stricken, permanently deleted, and barred from being published by debtor, ASUME, and all third parties involved within this petition;
- c. Dismiss this petition, so that San Juan Superior Court's proceedings are prevented from being abused, and permanently stalled by debtor.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the

requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this date **February 12, 2021.**

CERTIFICATE OF SERVICE

OUR CLIENT AND UNDERSIGNED ATTORNEY HEREBY CERTIFY: that this motion has been filed using the Bankruptcy Court's ECM/ECF electronic filing system which will automatically notify all participants to said system including the Office of the U.S. Trustee and the Chapter 13 Trustee. I HEREBY CERTIFY THAT all other parties included in attached master address list who are not participants of the Court's automatic filing system have been notified of this motion via regular mail sent on this same date.

Respectfully submitted.
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